



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

**HON. SYLVIA HINDS-RADIX**  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

**CAROLYN K. DEPOIAN**  
Senior Counsel  
Telephone: (212) 356-2358  
Fax: (212) 356-3509  
cdepoia@law.nyc.gov

April 5, 2022

**BY ECF**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Suhail Laureano v. City of New York, et al.  
17 CV 181 (LAP)

Your Honor:

Defendant writes in advance of the trial scheduled to begin on April 7, 2022. The parties have conferred and propose that Your Honor read the following instruction to the jury at the commencement of the trial:

You may notice that Mr. Lopez will not be here during the trial. You may also notice that defendant Linares will not be here for the entirety of the trial. You should not assume anything about them not being present. Nor should you draw any conclusions about the fact that they are not here. It is not something for you to be concerned about.

The parties have also conferred and agree that the stipulation annexed hereto as Exhibit "A" should be read to the jury at the appropriate juncture after the testimony of Mr. Lopez is played by video to the jury.

Defendants thank the Court for its time.

Respectfully submitted,

/s  
Carolyn K. Depoian  
Senior Counsel

cc: All counsel (by ECF)